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CLERK, US DISTRICT COURT
MINNEAPOLIS, MN

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

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CR 14-368

State of Minnesota,

Plaintiff-respondent,

Nov. 13, 14



Peggy M. Katch

v.

Tamika Suttles,

Defendant-petitioner.

Tamika Suttles,

Counterclaimant,

MOTION TO INTERVENE

v.

BY PEGGY M. KATCH

John Does 1-100,

AND EX PARTE TRO TO

Counterclaimees.

PRESERVE EVIDENCE

^^

Peggy M. Katch hereby moves to intervene in the above-captioned removed matter (which also alleged a counterclaim(s), which Katch seeks to join, in particular, claims regarding social security disability benefits) because she has an interest in the matter and the present parties would not represent that interest (FRCP 24(a)). Katch has worked with and for Jill Clark, and in particular in 2013 and 2014, Katch has assisted Clark in some confidential matters (which will not be further discussed at this time). Tamika Suttles contacted Katch several times in 2014, attempting to locate Jill Clark, as she wanted the assistance of an attorney who she could trust and would work hard for her. Due to circumstances beyond Katch's control, Katch was not able to assist Suttles, at first, in locating Clark, or in assisting Clark to assist Suttles. In October 2014, Suttles again contacted Katch, to let her know she was at HCMC, and her phone and other belongings had been taken, and she was being kept there against her will. Katch listened to the voicemail on her phone and believes it has not been deleted (at least not by her). In Katch's experience, such evidence is vulnerable to hackers or others with computer gear and expertise that Katch does not possess. Further, Suttles left Katch another voicemail on November 13, 2014, as well as a text message. Katch has (while gathering confidential information) experienced apparent theft or destruction of electronic evidence: time is of the essence. Katch seeks an emergent ex parte TRO to preserve all electronic evidence noted herein and more that the D. Minn. Judge(s) believe is appropriate.

SCANNED

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